

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IAN J. BROWN, JAMES BROWN, and
BARBARA BROWN,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
VERIZON NEW ENGLAND, INC., and
BOSTON EDISON COMPANY d/b/a/
NSTAR ELECTRIC,

Defendants .

Civ. No. 04-11924-RGS

UNOPPOSED UNITED STATES' MOTION FOR LEAVE TO FILE REPLY

Pursuant to rule 7.1(b)(3), the United States requests leave of the Court to file the accompanying brief replying Plaintiffs' Memorandum in Opposition to Defendant United States of America's Motion for Summary Judgment. The United States suggests that this Reply will be useful to the Court in evaluating whether the material facts are uncontested and in weighing the legal arguments of the parties.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Anita Johnson
Anita Johnson
Assistant U.S. Attorney
John Joseph Moakley Federal Courthouse
One Courthouse Way, Suite 9200

Boston, MA 02210
(617) 748-3282

CERTIFICATE OF SERVICE AND RULE 7.1 CONFERENCE

I hereby certify that the foregoing has been served upon Scott Charnas, counsel for Plaintiff, and Michael Callahan, counsel for Nstar, and all other attorneys of record by the electronic filing system, on this 25th day of May 2007 and that said counsel are not opposed to the filing of a Reply by the United States.

/s/ Anita Johnson